UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
TRENTON VICINAGE

ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC., BLAKE ELLMAN, and ALEXANDER DEMBOWSKI, Plaintiffs, v. GURBIR GREWAL, in his official capacity as Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police, THOMAS WILLIVER, in his official capacity as Chief of Police of the Chester Police Department, and JAMES B. O'CONNOR, in his official capacity as Chief of Police of the Lyndhurst Police Department, Defendants.	Hon. Peter G. Sheridan, U.S.D.J. Hon. Lois H. Goodman, U.S.M.J. Docket No. 3:18-cv-10507-PGS-LHG **DECLARATION OF GLENN STANTON**

I, Glenn Stanton, am competent to state, and declare the following, based on my personal knowledge:

1. I am a citizen of the United States and a resident of New Jersey.

2. I am over 21 years of age.

3. I am the State Range Master for the New Jersey Office of the Attorney General Division of Criminal Justice and have been so employed since 2013.

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4. I received a Bachelor of Science degree from Rutgers University in 1977. In 1985, I received a Juris Doctor degree from Seton Hall University School of Law.

5. Prior to working for the State, I was a Special Agent with the Federal Bureau of Investigations (FBI) from 1985 to 2011.

6. From 1992 until 2011, I was the Principal Firearms Instructor for the New York Office of the FBI. I was also the Head Sniper of the FBI New York Swat Team from 1996 until 2000.

7. I was a police officer for the Princeton Police Department from 1978 to 1982.

8. I have completed over 25 firearms training courses including: courses held by the FBI in Quantico, Virginia on firearms instruction and qualification courses for various firearms; a Glock Armorers Course; a Revolvers Course from the Smith & Wesson Academy; a Colt M16/AR-15 Rifle Course; a Colt .45 Semi-Automatic Pistol Course; a Long Range Rifle-1 Course held at the Storm Mountain Training Center; and a Jerry Barnhart's tactical pistol training course, among other courses. Additionally, I have been certified as a Firearms Instructor by the FBI and the New Jersey Division of Criminal Justice.

9. I am trained in and qualified to carry several types of firearms, including: Glock Models 17, 19, 26, 34 (9 mm), Models 22, 23, 27 (40 caliber), Models 20, 29 (10 mm), and Models 21, 30 (45 caliber); Smith & Wesson Models 60, 66, 13, 15, 686 (revolvers), Models 6906, 4506 (semi-automatics); Sig Sauer P226, 228 (9 mm), P220 (10 mm 45 caliber); Springfield 1911 (45 caliber); Colt M4 .223 caliber; Heckler & Koch MP5 (9 mm & 10 mm); Remington 700 sniper rifle .308; Remington 870 12 gauge pump shotgun; Winchester 70 sniper rifle .308; Benelli Super 90 12 gauge semi-automatic shotgun; M40 launcher; and Barrett M82 A1 50 caliber sniper rifle.

10. I have testified as an expert in the use of firearms in federal court for the Southern District and Eastern District of New York on at least three different occasions.

11. Since 2013, I have been employed by the State as the DCJ State Range Master. As Range Master, I am tasked with instructing police officers at the local and state level, and on occasion, federal agents, on the proper use of firearms.

12. Specifically, I conduct the following courses: Firearms Instructor School, Patrol Rifle Instructor School, Sub Gun Instructor School, and Sniper School.

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13. The Firearms Instructor School, which I conduct twice a year, permits police officers to qualify to become firearms instructors for their local police departments. During the course, I train officers as to different types of weapons, weapons nomenclature, the maintenance and care of weapons, and the fundamentals of shooting.

14. As part of the Patrol Rifle Instructor School, I train police officers on the use of US military style assault rifles. Specifically, I instruct officers as to the fundamentals of shooting, safe handling, troubleshooting, and maintenance of assault rifles.

15. During the Sub Gun Instructor School, I train officers with shoulder-mounted weapons which shoot pistol cartridges.

16. I teach Sniper School for police officers that are members of SWAT teams. During the school, I train police officers to be snipers for their local departments.

17. All law enforcement officers in the State of New Jersey are required to show proficiency in the use of firearms by successfully qualifying on both the Handgun Qualification Course (HQC) and the Night Handgun Qualification Course (NHQC) bi-annually. Proficiency is defined by the State as shooting an 80% on both the HQC and the NHQC.

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18. The same bi-annual qualification requirement applies to retired police officers. They are required to successfully qualify bi-annually on each weapon they personally own and wish to carry.

19. The standard issued weapon by the Division of Criminal Justice is the Glock 19 (9 mm), which has a 15 round magazine capacity. Law enforcement officers are required to show proficiency in the use of their duty weapon and any other off-duty weapon approved by their police department.

20. Both in the police academy, and in subsequent training, we train officers on how to safely store firearms. This means ensuring firearms are inoperable and inaccessible when they are not in use. Moreover, officers are issued safety locks for their firearms. Accordingly, every law enforcement officer, either active or retired, is instructed and trained on the safe storage of their firearms.

21. Moreover, every recruit in the police academy undergoes similar firearms training and is required to show proficiency in the use of firearms on a bi-annual basis once they become a police officer. This is required despite an individual's prior experience with firearms. Thus, individuals with military backgrounds undergo the same training that all law enforcement officers are required to undergo.

22. Individuals with military backgrounds are not exempted from the firearms training all police officers receive because the firearms training military recruits receive is vastly different than what is required of recruits in the police academy.

23. Specifically, having trained many officers with military backgrounds, military recruits generally receive very little, if any, handgun training. Whereas, law enforcement officers are required to undergo extensive handgun training.

24. In addition, law enforcement officers operate in a friendly environment unlike the hostile environments the military typically operates in. Accordingly, our rules of engagement differ. Law enforcement officers are accountable for every round fired and are instructed to avoid the indiscriminate destruction of property. Officers are only to use deadly force when it is necessary to protect themselves or others from death or grievous bodily harm.
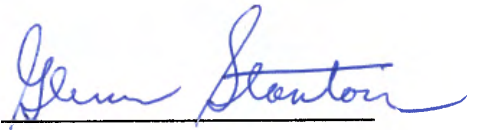
25. Based on my experience as a police officer, federal agent, and firearms instructor for over 22 years, gunfights are highly stressful situations. Accordingly, officers go through rounds quickly. Large capacity magazines are advantageous and necessary for law enforcement officers because it reduces their need to reload.

26. Conversely, the use and possession of large capacity magazines by individuals committing crimes is particularly harmful as it also reduces their need to reload.

27. During a gunfight, law enforcement officers need every advantage they can get.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 5, 2018

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Glenn Stanton

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